

Alyssa A. Qualls (IL Bar No. 6292124)
Email: quallsa@sec.gov
Amy S. Cotter (IL Bar No. 6238157)
Email: cottera@sec.gov
Raven A. Winters (IL Bar No. 6291077)
Email: wintersr@sec.gov

Attorneys for Plaintiff
Robert J. Burson, Associate Regional Director
Amy S. Cotter, Assistant Regional Director
Alyssa A. Qualls, Regional Trial Counsel
Securities and Exchange Commission
175 West Jackson Blvd., Suite 900
Chicago, Illinois 60604
Telephone: (312) 353-7390
Facsimile: (312) 353-7398

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COUNSEL/PARTIES OF RECORD	
DEC 27 2017	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Northern Division

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

DAVID B. KAPLAN, ESQ.,
SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS, LLC,
SYNCHRONIZED ORGANIZATIONAL
SOLUTIONS INTERNATIONAL, LTD.,
and MANNA INTERNATIONAL
ENTERPRISES, INC.,

Defendants,

and

LISA M. KAPLAN,
THE WATER-WALKING
FOUNDATION, INC., and
MANNA INVESTMENTS, LLC,

Relief Defendants.

Case No. 3:16-cv-00270-MMD-VPC

Honorable Miranda Du

**STIPULATION TO EXTEND TIME TO
FILE CASE MANAGEMENT REPORT AND
HOLD CASE MANGEMENT
CONFERENCE**

THIRD REQUESTED EXTENSION

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned parties, as follows:

1 1. On August 29, 2017, Plaintiff United States Securities and Exchange Commission
2 ("SEC" or "Commission"), Defendant David B. Kaplan, and Relief Defendant Lisa Kaplan
3 (collectively, the "Parties") filed a Stipulation for Extension of Time to File Case Management
4 Report and Hold Case Management Conference (First Request). (ECF No. 86.)

5 2. On September 5, 2017, the Honorable Magistrate Judge Valerie B. Cooke granted
6 the request (ECF No. 87), scheduled a case management conference for October 18, 2017, at 9:30
7 a.m. PDT, and directed the parties to file a case management report no later than the close of
8 business on October 6, 2017 (ECF No. 88).

9 3. Thereafter, the Parties reached an agreement to resolve this matter. Defendant David
10 Kaplan and Relief Defendant Lisa Kaplan have executed consents to the terms of settlement before
11 a notary public, and the SEC staff has commenced the process of obtaining approval of the
12 agreement by the Commission.

13 4. On October 4, 2017 the Parties filed a Stipulation for Extension of Time to File Case
14 Management Report and Hold Case Management Conference (Second Request), requesting a 90-
15 day extension of time to file the case management report, or until January 5, 2018, to allow for
16 sufficient time to obtain Commission approval. (ECF No. 89.)

17 5. On October 10, 2017, the Court granted the request. (ECF No. 90.)

18 6. The SEC staff continues to seek approval of the agreement by the Commission and
19 estimates that it will need an additional 30 days to obtain final approval.

20 7. Once approval has been obtained, the SEC will file a Motion for Entry of Judgment
21 before the Honorable Miranda Du.

22 8. The Parties expect that this process will be complete by end of January 2018.

23 9. Accordingly, the Parties respectfully request that the time to file the case
24 management report be extended approximately 30 days, or until February 5, 2018, and that the case
25 management conference be scheduled sometime thereafter, at the convenience of the Court.

26 10. This is the Parties' third request for an extension of time regarding the case
27 management report and conference.

28 Date: December 15, 2017

1 /s/ Alyssa A. Qualls

2 Alyssa A. Qualls (IL Bar No. 6292124)

3 175 West Jackson Blvd., Suite 900

4 Chicago, Illinois 60604

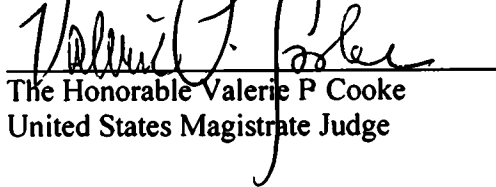
5 Telephone: (312) 353-7390

6 Facsimile: (312) 353-7398

7 Email: quallsa@sec.gov

8
9 Counsel for Plaintiff United States Securities
10 and Exchange Commission

11 IT IS SO ORDERED:

12 
13 The Honorable Valerie P Cooke
14 United States Magistrate Judge

/s/ David B. Kaplan

David B. Kaplan

1314-B Cave Rock Drive

Glenbrook, NV 89413

Telephone: (509) 263-4625

Email: Director@SOSforBiz.com

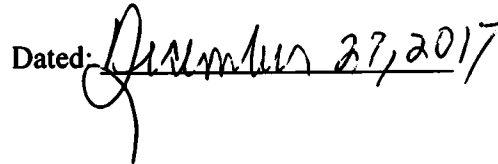
/s/ Lisa Kaplan

Lisa Kaplan

1314-B Cave Rock Drive

Glenbrook, NV 89413

Telephone: (509) 263-4625

Dated:  27, 2017